

1 MICHAEL W. MALTER. #96533
2 ROBERT G. HARRIS, #124678
3 JULIE H. ROME-BANKS, #142364
4 Binder & Malter, LLP
5 2775 Park Avenue
6 Santa Clara, CA 95050
7 T: (408) 295-1700
8 F: (408) 295-1531
9 Email: Michael@bindermalter.com
10 Email: Rob@bindermalter.com
11 Email: Julie@bindermalter.com

12 Attorneys for Debtors-In-Possession,
13 FRE 355 INVESTMENT GROUP, LLC and
14 MORA HOUSE, LLC

15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA - DIVISION 5**

17 In re:	Case No. 20-50628-SLJ
18 FRE 355 INVESTMENT GROUP, LLC, dba 19 FRE 355,	Cases Jointly Administered Chapter 11
20 Debtor.	
21 In re	Case No. 20-50631-SLJ
22 MORA HOUSE, LLC,	Chapter 11
23 Debtor.	Date: September 3, 2020 Time: 1:30 p.m. Courtroom: 9 Tele/Video

24 **SECOND JOINT CHAPTER 11 STATUS CONFERENCE STATEMENT**

25 Comes now Debtors FRE 355 Investment Group, LLC (“FRE 355”) and Mora House, LLC
26 (“Mora” together with FRE 355 the “Debtors”) and respectfully represent:

27 1. The Debtors incorporate by reference the history of events leading up to the
28 bankruptcy filing as reflected in the initial chapter 11 status conference statement filed in these
cases at docket #50.

1 2. The Debtors filed a joint chapter 11 plan and a disclosure statement on July 10,
2 2020 (docket #64 and 65 respectively). The plan and disclosure statement were filed within the
3 90-day period for these single asset real estate cases pursuant to 11 U.S.C. §362(d)(3) and within
4 the exclusive time for the Debtors to file a plan of August 11, 2020. Accordingly, the exclusive
5 time for the Debtors to solicit acceptances is October 10, 2020. The hearing to approve the
6 disclosure statement is scheduled for the same time as this continued status conference.

7 3. The U.S. Trustee filed an objection to the disclosure statement about which the
8 parties met and conferred, in part. The Debtors will, through counsel, communicate further and
9 attempt to generate an agreed amendment to satisfy the concerns raised.

10 4. There is pending before the Court the (a) motion for relief from stay and (b) a
11 related motion to dismiss the bankruptcy, both filed by secured creditor Platinum Loan Servicing
12 ("Platinum"). The Court has set a final hearing on both matters together for September 29, 2020
13 and issued a schedule for the Debtor to file opposition to the motion for relief from stay and for a
14 reply. The Debtor previously filed opposition to the motion to dismiss on August 5, 2020 (docket
15 #79, 79-1 and 79-2). The Debtors anticipate filing an objection to the claim of Platinum within the
16 next few days and will seek informal discovery regarding the claim as well as Platinum's two
17 pending motions.

18 5. The Debtors have provided proof of insurance coverage on both properties to the
19 United States Trustee as well as to counsel for Platinum. Both properties are insured under a
20 policy with State Farm.

21 6. The Debtors are current in the filing of monthly operating reports and payment of
22 quarterly fees to the U.S. Trustee.

23 Dated: August 27, 2020

BINDER & MALTER, LLP

24

25 By: /s/ Robert G. Harris

26 Robert G. Harris

27 Attorneys for Debtors

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